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February 19, 2016

Marilyn D. Go, United States Magistrate Judge
United States Courthouse, Courtroom No. 11C
225 Cadman Plaza East
Brooklyn, New York

RE: Century Surety Company v. AA General Trading Corp, et al.
Index No.: 1:15-cv-04509 (ARR)(MDG)
Our File No.: 20150721

Dear Magistrate Go:

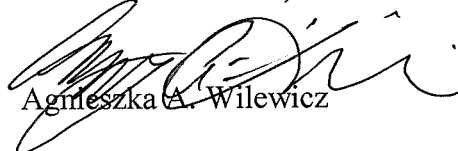
This office represents the plaintiff Century Surety Company in the above-referenced declaratory judgment action. On behalf of counsel for all parties to the above action, we write now to request the scheduling of a settlement conference, as was discussed at our last in-person conference on November 9, 2015 and in furtherance of the scheduling order that was entered on December 15, 2015 in this matter.

Since our last submission, the parties have been undertaking discovery. In the interim, counsel for the Kaplan defendants left his firm and new counsel was assigned. This gave the parties an opportunity to reevaluate the matter and reassess the possibility of settlement. As you will recall, at our last conference with Your Honor, the parties had hoped to schedule a settlement conference with you, but as of December were unable to come to an agreement. At this time, however, the parties have conferred again. We are ready to discuss settlement and request a mutually agreeable date and time in April 2016.

Moreover, in light of this development, all counsel request an adjournment of the current discovery schedule, including extending the timeframes in which to disclose expert discovery.

Respectfully submitted,

HURWITZ & FINE, P.C.


Agnieszka A. Wilewicz

AAW/rmk

cc: (via ECF only)

Zaklukiewicz, Puzo, & Morrissey, LLP
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